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Attorneys for Plaintiff Cesar Rodriguez Ramirez

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CESAR RODRIGUEZ RAMIREZ, an
individual,

Plaintiff,

v.

NUEVO ORDEN MUSIC LLC, a California
limited liability company; NUEVO ORDEN
MUSIC, a California general partnership;
MARTHA FRAILE, an individual; JOSÉ
DAVID HERNANDEZ, an individual;
ENRIQUE NARANJO, an individual; and
DANIEL FERNANDEZ, an individual,

Defendants.

Case No.: 2:15-cv-02472-JAD-GWF

**STIPULATION TO EXTEND TIME TO
RESPOND TO DEFENDANT'S
AMENDED ANSWER AND
COUNTERCLAIM; ORDER THEREON**

Plaintiff Cesar Rodriguez Ramirez ("Plaintiff") by and through his counsel, GIBSON
LOWRY LLP, and Defendants Nuevo Orden Music LLC, Nuevo Orden Music, and José David
Hernandez (collectively, the "Defendants") by and through their respective counsel, Reynolds &
Associates, hereby request the Court allow Plaintiff an additional fourteen consecutive days,
through and including Monday, May 23, 2016, to file and serve a responsive pleading to the
Amended Answer and Counterclaim of the Defendants. Plaintiff and Defendants jointly stipulate
to this extension in view of their ongoing settlement negotiations, terms of which have been

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1 agreed to generally, and the fact that the parties anticipate closure of this matter prior to Monday,
2 May 23, 2016.

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4 Respectfully submitted this 5th day of May, 2016.

5 GIBSON LOWRY LLP

REYNOLDS & ASSOCIATES

6 /s/ J.D. Lowry.

/s/ Harrison J. Reynolds

7 STEVEN A. GIBSON, ESQ.

HARRISON J. REYNOLDS, ESQ.

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Music LLC, Nuevo Orden Music, and José

Attorneys for Plaintiff Cesar Rodriguez

David Hernandez

11 *Ramirez*

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15 IT IS SO ORDERED:

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18 UNITED STATES MAGISTRATE JUDGE

19 DATE: May 6, 2016
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